

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

	X	
SECURITIES AND EXCHANGE	:	
COMMISSION,	:	
	:	
Plaintiff,		
	:	
-against-		Civil Action No. 1:21-cv-00260-PB
	:	
LBRY, INC.,	:	
	:	
Defendant.		
	X	

**ASSENTED-TO MOTION FOR
EXPEDITED BRIEFING SCHEDULE**

Defendant LBRY, Inc. (“LBRY”), with the assent of Plaintiff Securities and Exchange Commission (the “Commission”), moves for an expedited briefing schedule concerning the remedies sought by the Commission in the above-captioned matter.

LBRY provided the Commission with a settlement proposal on Friday, November 25, which was consistent with the framework laid out by Your Honor during the November 21, 2022 status conference. The parties discussed LBRY’s settlement proposal via a video conference on November 29, 2022 and were unable to reach a resolution with respect to the remedies sought by the Commission. Given LBRY’s financial condition, LBRY respectfully requests that the Court order an expedited briefing schedule concerning the remedies sought by the Commission in this litigation. A proposed briefing schedule, with which the Commission agrees, is included below:

Brief	Proposed Deadline
LBRY Motion	Wednesday, December 7, 2022
Commission Response	Wednesday, December 14, 2022
LBRY Reply	Monday, December 19, 2022

Dated: November 30, 2022

Respectfully submitted,
LBRY, INC.

/s/ Timothy J. McLaughlin (NH Bar # 19570)

William E. Christie
Timothy J. McLaughlin
Shaheen & Gordon, P.A.
107 Storrs Street
P.O. Box 2703
Concord, NH 03302
(603) 819-4231
wchristie@shaheengordon.com
tmclaughlin@shaheengordon.com

/s/ Keith W. Miller

Keith W. Miller (*pro hac vice*)
Rachel S. Mechanic (*pro hac vice*)
Perkins Coie LLP
1155 Avenue of the Americas, 22nd Floor
New York, New York 10036-2711
(212) 262-6900
KeithMiller@perkinscoie.com
Rmechanic@perkinscoie.com

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: November 30, 2022

/s/ Keith W. Miller
Keith W. Miller

CERTIFICATE OF CONFERENCE

Pursuant to LR 7.1(c), LBRY sought the Commission's concurrence before filing this motion. The Commission has assented to the relief sought.

Dated: November 30, 2022

/s/ Keith W. Miller
Keith W. Miller